EXHIBIT 'A'

FOX LAW, P.C.
BY: JOHN F. FOX, JR.
Identification No. 31854
Two Logan Square – Suite 2030
100 N. 18th Street
Philadelphia, PA 19103
(215) 568-6868

Attorney for Plaintiffs
Audrey Ziadat and
Brian Andris, h/w

Filed and Attested by PROTHONOTARY 28 MAY 2014 02:46 pm K. EDWARDS

AUDREY ZIADAT and BRIAN ANDRIS, h/w 203 THROEAU COURT LANDENBERG, PA 19350-9512	: PHILADELPHIA COUNTY : COURT OF COMMON PLEAS : CIVIL DIVISION :
Vs	: TERM, 2014 :
	: MAJOR NON JURY
TOYS R US 2703 SOUTH 3rd STREET PHILADELPHIA, PA 19148-4700	: : : NO.

NOTICE TO DEFEND

You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and notice are served, by entering a written appearance personally or by an attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if your fail to do so the case may proceed without you and a judgment may be entered against you by the Court without further notice for any money claimed in the Complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siquientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o en persona o con un obogado y entregar a la courte en forma escrita sus defesas o sus objectiones a las demandes en contra de su persona. Sea avissado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo avise o notificacion. Ademas, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder.

LAWYER REFERENCE SERVICE
PHILADELPHIA BAR ASSOCIATION
1101 Market Street, 11th Floor
Philadelphia, PA 19107
215-238-6300

134.14033

FOX LAW, P.C.
BY: JOHN F. FOX, JR.
Identification No. 31854
Two Logan Square – Suite 2030
100 N. 18th Street
Philadelphia, PA 19103
(215) 568-6868

Attorney for Plaintiffs
Audrey Ziadat and
Brian Andris, h/w

AUDREY ZIADAT and BRIAN ANDRIS, h/w 203 THROEAU COURT LANDENBERG, PA 19350-9512	: PHILADELPHIA COUNTY : COURT OF COMMON PLEAS : CIVIL DIVISION :
Vs	: TERM, 2014 :
TOYS R US 2703 SOUTH 3rd STREET PHILADELPHIA, PA 19148-4700	: MAJOR NON JURY : : : NO.

COMPLAINT IN CIVIL ACTION

AND NOW, comes the plaintiffs, Audrey Ziadat and Brian Andris, by and through their undersigned counsel, hereby file the foregoing complaint in civil action, and, in support thereof, aver as follows:

1. Plaintiff Audrey Ziadat is an adult individual residing at 203 Throeau Court, Landenberg, PA 19350-9512.

2. Plaintiff Brian Andris is an adult individual and husband of plaintiff Audrey Ziadat residing at 203 Throeau Court, Landenberg, PA 19350-9512.

3. Defendant Toys R Us is a corporation authorized to do business in the Commonwealth of Pennsylvania and regularly conducts business in the City and County of Philadelphia, Pennsylvania with a place of business located at the above address.

4. On or about June 17, 2012, plaintiff Audrey Ziadat was a customer and business invitee lawfully shopping in the aisle of a Toys R Us store located at 10 Geoffrey Drive, Newark, DE 19702, when suddenly and without warning a Fire Extinguisher hanging on a pole in the

middle of an aisle fell on plaintiff Audrey Ziadat's right foot causing her to sustain the injuries and damages hereinafter set forth at length.

COUNT I

AUDREY ZIADAT v TOYS R US

5. Plaintiff Audrey Ziadat incorporates by reference paragraphs 1 through 4 of her complaint as if fully set forth herein at length.

6. The accident was caused solely by the carelessness and negligence of defendant Toys R Us, its agents, servants and/or employee acting as aforesaid and consisting inter alia of the following:

(a) Failing to adequately and properly secure the fire extinguisher that was hanging on the pole;

(b) Failing to have the proper secured locking device for the fire extinguisher as the fire extinguisher was hanging on the pole;

(c) Failing to inspect the fire extinguisher to make sure that the fire extinguisher was secured;

(d) Failing to maintain and inspect the securement of the fire extinguisher;

(e) Failing to prevent the fire extinguisher from falling to the floor;

(f) Allowing the above described conditions to exist for an unreasonable period of time and/or in the alternative, actually causing the condition to exist;

(g) Failing to repair the above described conditions;

(h) Failing to provide plaintiff Audrey Ziadat with warnings of the aforesaid conditions;

(i) Failing to replace the device that allegedly secured the fire extinguisher which was in a defective condition and which was not properly designed to prevent the fire extinguisher from falling onto plaintiff Audrey Ziadat's right foot; and

(j) Failing to make reasonable and regular inspections to make sure the fire extinguisher was secure and failing to observe the dangerous condition that was hazardous to customers/business invitees;

7. Solely as a result of the negligence and carelessness of defendant Toys R Us, plaintiff Audrey Ziadat has suffered injuries which are serious and permanent in nature, including a laceration to her right foot requiring stitches, ankle avulsion, right foot numbness, hypersensitivity, heel pain, tingling and residual nerve injury affecting superficial peroneal as well as other injuries which may be diagnosed by plaintiff Audrey Ziadat's health care providers, all of which injuries have in the past and may in the future cause plaintiff Audrey Ziadat great pain and suffering and will cause in the future serious impairment of bodily function.

8. As a further result of the negligence and carelessness of defendant Toys R Us, plaintiff Audrey Ziadat has been or will be required to receive and undergo medical attention and to expend various sums of money and to incur various expenses and she may be required to continue to expend such sums or incur such expenditures for an indefinite time in the future.

9. As a result of the negligence and carelessness of defendants Toys R Us, plaintiff Audrey Ziadat has a medically determinable physical impairment which prevents plaintiff Audrey Ziadat from adequately performing all or substantially all of the material acts and duties which constitute plaintiff Audrey Ziadat's usual and customary activities prior to the accident.

10. As a further result of the negligence and carelessness of defendants Toys R Us, plaintiff Audrey Ziadat has or may hereinafter incur other financial expenses which do or may exceed amounts that plaintiff Audrey Ziadat may otherwise be entitled to recover including payment for medical bills.

11. As a direct result of the negligence and carelessness of defendants Toys R Us, its agents, servants, employees and/or contractors, plaintiff Audrey Ziadat has or may hereinafter

suffer severe physical pain, mental anguish, humiliation and embarrassment and she may continue to suffer same for an indefinite time in the future.

12. As a direct result of the negligence and carelessness of defendants Toys R Us, plaintiff Audrey Ziadat has and may suffer a severe loss of earnings and/or impairment of her earning capacity and power.

WHEREFORE, Plaintiff Audrey Ziadat demands judgment against defendant Toys R Us for a sum in excess of $50,000.00 plus interest and costs.

COUNT II
AUDREY ZIADAT v TOYS R US
RES IPSA LOQUITUR

13. Plaintiffs incorporate by reference paragraphs 1 through 12 of their complaint as if fully set forth herein at length.

14. The fire extinguisher falling from the pole as described above is an event which ordinarily does not occur in the absence of negligence.

15. Plaintiffs assert that there are no other responsible causes which could have caused the fire extinguisher to fall from the pole.

16. Plaintiffs allege that defendant Toys R Us's negligence is within the scope of defendant Toys R Us's duty to the plaintiff Audrey Ziadat.

17. Defendant Toys R Us knew or by the exercise of reasonable care should have discovered the condition described above and should have realized that it involved an unreasonable risk of harm to plaintiff Audrey Ziadat, a business invitee of the store.

18. Defendant Toys R Us failed to exercise reasonable care to protect plaintiff Audrey Ziadat against the danger of the fire extinguisher falling from the pole.

WHEREFORE, Plaintiff Audrey Ziadat demands judgment against defendant Toys R Us for a sum in excess of $50,000 plus interest and cost.

COUNT III
PLAINTIFF BRIAN ANDRIS v DEFENDANT TOYS R US

19. Plaintiffs incorporate by reference paragraphs 1 through 18 of their complaint as if fully set forth herein at length.

20. At all times material to this cause of action, plaintiff Brian Andris was the husband of plaintiff Audrey Ziadat.

21. As a direct result of defendant Toys R Us's negligence and carelessness, plaintiff Brian Andris has suffered the loss of society, comfort, companionship, services and consortium of his wife, plaintiff Audrey Ziadat, all to his great detriment and loss.

WHEREFORE, Plaintiff Brian Andris demands judgment against defendant Toys R Us for a sum in excess of Fifty Thousand Dollars ($50,000) plus interest and costs..

FOX LAW, P.C.

JOHN F. FOX, JR., ESQUIRE
Attorney for Plaintiffs
Audrey Ziadat and Brian Andris, h/w

VERIFICATION

AUDREY ZIADAT and BRIAN ANDRIS, hereby state that they are the **Plaintiffs** in this cause of action and verifies that the statements made in the foregoing **COMPLAINT IN CIVIL ACTION** are true and correct to the best of their knowledge, information and belief.

The undersigned understand that the statements contained therein are made subject to the penalties of 18 Pa.C.S.A. § 4904 relating to unsworn falsification to authorities.

Audrey Ziadat

AUDREY ZIADAT

DATE: 5.26.14

BRIAN ANDRIS

DATE: 5-26-14

EXHIBIT 'B'

JOHN F. FOX, JR., ESQUIRE

WWW.JFOXLAW.COM
JOHNFOX@JFOXLAW.COM

FOX LAW P.C.

ATTORNEYS AT LAW

TWO LOGAN SQUARE
SUITE 2030
100 NORTH 18TH STREET
PHILADELPHIA, PA 19103

PHONE: (215) 568-6868
FAX: (215) 568-2352

June 10, 2014

Francis S. Blatcher, Esquire
Mallon and Blatcher
12 South Monroe Street
Media, PA 19063

Re: My Client: Audrey Ziadat
Your Claim No.: 831412005671
D/O/A: June 17, 2012

Dear Frank:

Please allow this letter to serve as a follow up to our telephone conversation dated June 9, 2014 wherein you advised me that you have been retained to represent Toys R Us with respect to the above matter. It will be a pleasure working with you on this case. As we discussed, enclosed please find a copy of the following medical records relating to treatment rendered to Audrey Ziadat as a result of this accident:

1. Christiana Hospital;
2. Delaware Orthopedic Specialist/Paul C. Kupcha, M.D.;
3. The Health Center at Christiana – Elizabeth A. Jackovic, D.O.;
4. Christiana Care Neurology Specialist/Alison Potter, D.O.;
5. Christiana Cosmetic Surgery Consultants/Katheryn Warren, M.D.

Upon a review of the records, you will find that my client suffered a significant laceration to her right foot as a result of the fire extinguisher falling off the pole. The wound was sutured and she was discharged on crutches and was prescribed several medications for pain and infection. The sutures were removed on July 6, 2012. She was required to wear a boot and was non-weight bearing through August 2012. By September 2012, she was still having problems with her right foot. She had hypersensitivity of the scar and thickening of the scar. At that time, the doctor thought she had a possible superficial sensory nerve injury.

Because the scar continues to be extremely hypersensitive to the point where she could not bear to have anything touch the scar, she sought treatment with Dr. Warren, a cosmetic surgeon and was told that the scar cannot be improved by surgical means. On August 22, 2013, she was treated by neurologist Alison Potter. At that time, she was still complaining of right foot numbness and pain. It was Dr. Potter's opinion that she suffered a residual nerve injury from the event which was affecting her superficial peroneal and recommended additional nerve pain medication.

It is now two years since the accident and my client is still experiencing significant hypersensitivity in the wound area. The scar is still very sensitive to the touch and she cannot wear any flat shoes and/or heels that cut below the ankle in that the scar is located in the same area. If her scar is touched, it is very painful and numb at the same time. Because of the scar's sensitivity, she has difficulty sleeping because the sheets on her bed touch the scar and she is constantly aware of that sensation.

As I stated previously, she is constantly guarding the scar so that she can avoid the pain. Lastly, you and I discussed my client making a demand so that you can make a decision with respect to removal. I have discussed this issue with my clients who are both attorneys and they have authorized me to make a demand in the amount of $150,000. They have decided not to cap the damages at $75,000 to keep the case in Philadelphia County.

Please take a look at the medicals. If you would like to depose my clients for further evaluation so that you can report to your client, please let me know and I will make my clients available for a deposition right away.

I look forward to working with you on this matter.

Very truly yours,

JOHN F. FOX, JR.

JFF/am

Enclosures

EXHIBIT 'C'

The Philadelphia Courts
Civil Docket Access

No Items in Cart LOGIN

Civil Docket Report

A $5 Convenience fee will be added to the transaction at checkout.

Case Description

Case ID:	140503332
Case Caption:	ZIADAT ETAL VS TOYS R US
Filing Date:	Wednesday, May 28th, 2014
Court:	MAJOR JURY-EXPEDITED
Location:	City Hall
Jury:	JURY
Case Type:	PERSONAL INJURY - OTHER
Status:	WAITING TO LIST CASE MGMT CONF

Related Cases

No related cases were found.

Case Event Schedule

No case events were found.

Case motions

No case motions were found.

Case Parties

Seq #	Assoc	Expn Date	Type	Name
1			ATTORNEY FOR PLAINTIFF	FOX JR., JOHN F
Address:	TWO LOGAN SQUARE, SUITE 2030 100 N. 18TH STREET PHILADELPHIA PA 19103 (215)568-6868	**Aliases:**	*none*	
2	1		PLAINTIFF	ZIADAT, AUDREY
Address:	203 THROEAU COURT LANDENBERG PA	**Aliases:**	*none*	

	19350			
3	1		PLAINTIFF	ANDRIS, BRIAN
Address:	203 THROEAU COURT LANDENBERG PA 19350	**Aliases:**	*none*	
4	6		DEFENDANT	TOYS R US
Address:	2703 SOUTH 3RD STREET PHILADELPHIA PA 19148	**Aliases:**	*none*	
5		10-JUN-2014	TEAM LEADER	FOX, IDEE C
Address:	656 City Hall PHILADELPHIA PA 19107 (215)686-4222	**Aliases:**	*none*	
6			ATTORNEY FOR DEFENDANT	BLATCHER, FRANCIS S
Address:	MALLON BLATCHER 12 SOUTH MONROE STREET MEDIA PA 19063 (610)891-8400	**Aliases:**	*none*	
7			TEAM LEADER	RAU, LISA M
Address:	ROOM 593 CITY HALL PHILADELPHIA PA 19107 (215)686-3768	**Aliases:**	*none*	

Docket Entries

Filing Date/Time	Docket Type	Filing Party	Disposition Amount	Approval/ Entry Date

28-MAY-2014 01:46 PM	ACTIVE CASE			28-MAY-2014 04:39 PM
Docket Entry:	E-Filing Number: 1405052345			
28-MAY-2014 01:46 PM	COMMENCEMENT OF CIVIL ACTION	FOX JR., JOHN F		28-MAY-2014 04:39 PM
Documents:	Click link(s) to preview/purchase the documents Final Cover	Click HERE to purchase all documents related to this one docket entry		
Docket Entry:	*none.*			
28-MAY-2014 01:46 PM	COMPLAINT FILED NOTICE GIVEN	FOX JR., JOHN F		28-MAY-2014 04:39 PM
Documents:	Click link(s) to preview/purchase the documents Complaint.pdf	Click HERE to purchase all documents related to this one docket entry		
Docket Entry:	COMPLAINT WITH NOTICE TO DEFEND WITHIN TWENTY (20) DAYS AFTER SERVICE IN ACCORDANCE WITH RULE 1018.1 FILED.			
28-MAY-2014 01:46 PM	SHERIFF'S SURCHARGE 1 DEFT	FOX JR., JOHN F		28-MAY-2014 04:39 PM
Docket Entry:	*none.*			
28-MAY-2014 01:46 PM	WAITING TO LIST CASE MGMT CONF	FOX JR., JOHN F		28-MAY-2014 04:39 PM
Docket Entry:	*none.*			
08-JUN-2014 10:06 PM	AFFIDAVIT OF SERVICE FILED			09-JUN-2014 04:08 PM
Documents:	Click link(s) to preview/purchase the documents Affidavit of Service	Click HERE to purchase all documents related to this one docket entry		

Docket Entry:	AFFIDAVIT OF SERVICE OF PLAINTIFF'S COMPLAINT UPON TOYS R US BY PERSONAL SERVICE ON 06/02/2014 FILED.			
10-JUN-2014 11:23 AM	ENTRY OF APPEARANCE FILED	BLATCHER, FRANCIS S		10-JUN-2014 01:40 PM
Documents:	Click link(s) to preview/purchase the documents Entry of Appearance.pdf		Click HERE to purchase all documents related to this one docket entry	
Docket Entry:	ENTRY OF APPEARANCE OF FRANCIS S BLATCHER FILED. (FILED ON BEHALF OF TOYS R US)			
10-JUN-2014 11:23 AM	JURY TRIAL PERFECTED			10-JUN-2014 01:40 PM
Docket Entry:	12 JURORS REQUESTED.			
10-JUN-2014 01:40 PM	TRANSFERRED TO MAJOR JURY			10-JUN-2014 12:00 AM
Docket Entry:	*none.*			
10-JUN-2014 01:40 PM	WAITING TO LIST CASE MGMT CONF			10-JUN-2014 12:00 AM
Docket Entry:	*none.*			

Case Description   Related Cases   Event Schedule   Case Parties   Docket Entries

Search Home